SMUD
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AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

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U.S. Nuclear Regulatory Commission
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Docket 50-312
Rancho Seco Nuclear Generating Station
License DPR-54
Docket 72-11
Rancho Seco Independent Spent Fuel Storage Installation
License SNM-2510

CHANGES TO RANCHO SECO QUALITY ASSURANCE PROGRAM

Attention: John Hickman

In accordance with 10 CFR 50.54(a)(4) and 10 CFR 50.4(b)(7), the Sacramento Municipal Utility District (SMUD) submits changes to the Rancho Seco Quality Assurance Program (QAP) description. The changes affect the Rancho Seco audit program, reduce some audit frequencies, and eliminate one element of the Fire Protection Program audit. Therefore, the changes reduce QAP commitments.

Since the NRC has previously accepted the QAP as satisfying the quality assurance program requirements in accordance with 10 CFR 72.140(d), the QAP changes described herein apply to both SMUD's 10 CFR 50 and 10 CFR 72 licenses (DPR-54 and SNM-2510, respectively). In accordance with 10 CFR 50.54(a)(4)(iv), the NRC considers the proposed QAP changes accepted upon SMUD receipt of an NRC acceptance letter or 60 days after SMUD submits the enclosed changes to the NRC, whichever occurs first.

Attachment 1 contains the description, reason, and basis for the proposed Rancho Seco Quality Manual (RSQM) audit program changes. Attachment 2 contains the changed RSQM pages. Revision arrows in the left hand margin of the changed RSQM pages indicate the area of change.

NMSS01

You or members of your staff requiring additional information or clarification may contact Richard Mannheimer at (916) 732-4916.

Sincerely,

Steve J. Redeker
Manager, Plant Closure and Decommissioning

Attachments (2)

cc w/Atch: Region IV Administrator, NRC, Arlington
Director, Spent Fuel Project Office, NMSS, NRC, Washington DC 20555-0001

ATTACHMENT 1

BASIS FOR CHANGES TO RANCHO SECO QUALITY ASSURANCE PROGRAM

Description and Reason for Changes

The District proposes to make the following changes to some Rancho Seco Quality Assurance Program (QAP) audit frequencies and the fire protection program audit addressed in the Rancho Seco Quality Manual (RSQM) Section XVIII, "Audits."

1. The Performance and Qualifications of Nuclear Facility Technical Staff audit (RSQM Section XVIII, Step 6.1b) is currently performed once per year. The District is reducing this audit frequency to once every two years.

2. The Corrective Action Program (CAP) audit (RSQM Section XVIII, Step 6.1c) is currently performed once every six months. The District is reducing this audit frequency to once every two years.

3. The Rancho Seco Fire Protection Program (FPP) audit currently has an annual and a biennial audit component. The District is maintaining the biennial Fire Protection Requirements and Implementing Procedures Compliance audit (RSQM Section XVIII, Step 6.1h) and eliminating the annual Independent Fire Protection and Loss Prevention inspection and audit (previously RSQM Section XVIII, Steps 6.1i and 6.1j).

4. The Radiological Environmental Monitoring Program (REMP) audit (previously RSQM Section XVIII, Step 6.1k; now Step 6.1i) is currently performed once per year. The District is reducing the REMP audit frequency to once every two years.

5. The Quality Assurance Program for Effluent Control and Environmental Monitoring audit (previously RSQM Section XVIII, Step 6.1n; now Step 6.1l) is currently performed once per year. The District is reducing this audit frequency to once every two years.

The District requests these audit program changes to eliminate an unnecessary administrative burden during the final phases of decommissioning and allow the District to more efficiently allocate its resources while the District continues to safely dismantle and decontaminate the Rancho Seco nuclear power plant and store spent fuel at the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI).

Basis for Concluding the Revised QAP Continues to Satisfy the 10 CFR 50, Appendix B Criteria

The following information provides the justification and basis supporting the proposed QAP audit program changes. Each audit program change is addressed separately below. The changes reduce some audit frequencies and eliminate a portion of the FPP audit, but the changes do not eliminate auditing in any QAP audit area. Therefore, the revised QAP continues to satisfy the 10 CFR 50, Appendix B criteria, specifically criterion XVIII, Audits."

BASIS FOR CHANGES TO RANCHO SECO QUALITY ASSURANCE PROGRAM

Performance and Qualifications of Nuclear Facility Technical Staff Audit (RSQM Section XVIII, Step 6.1b):

The District is reducing the Performance and Qualifications of Nuclear Facility Technical Staff audit frequency from once per year to once every two years. The following discussion provides the basis for reducing the Performance and Qualifications audit frequency.

The current operational demands, safety concerns, and regulatory requirements applicable to Rancho Seco during decommissioning with all spent fuel stored at the ISFSI are significantly less than they were during reactor operations or decommissioning operations with spent fuel stored in the spent fuel pool. In the Safety Evaluation Report for Rancho Seco License Amendment 129, The NRC concluded there are no longer any nuclear safety issues associated with 10 CFR 50 licensed activities. In addition, the District has completed a majority of the dismantlement work (except large components), including removal of over 90% of the Reactor Building systems, about 90% of the Auxiliary Building equipment, all the secondary plant equipment from the Turbine Building, and most generated decommissioning waste. Also, storing spent fuel at the ISFSI is an essentially static activity with security the predominant function. Plant personnel perform a few, periodic maintenance activities designed to monitor the condition of the fuel canisters and storage system.

In accordance with License Amendment 129, the ANSI N18.1-1971 and Regulatory Guide 1.8 (September 1975) qualification requirements no longer apply to 10 CFR 50 licensed activities with all spent fuel stored at the ISFSI. But, in accordance with Rancho Seco ISFSI Technical Specification 5.3 (ITS 5.3), these qualification requirements do apply to 10 CFR 72 (ISFSI) licensed activities. Also, ITS 5.3 includes a requirement to maintain procedures for training individuals performing 10 CFR 72 licensed activities.

Most District employees working at Rancho Seco have many years of nuclear power plant experience and worked at Rancho Seco during reactor operations and spent fuel storage in both the spent pool fuel and at the ISFSI. Also, Rancho Seco continues to maintain a training program in accordance with approved procedures for the decommissioning staff as well as the ISFSI staff. Worker experience, coupled with training program implementation and continued auditing in the Performance and Qualifications area, provides assurance plant staff will continue to be adequately trained and qualified, and staff performance and qualifications will continue to be evaluated during ISFSI and decommissioning activities.

The District reviewed the results of the Performance and Qualifications of Nuclear Facility Technical Staff audit for the last five years and concludes that reducing the audit frequency for this audit to once every two years will not adversely impact District's ability to safely decommission Rancho Seco or safely store spent fuel at the ISFSI. The District did not identify any significant problems during the five-year period reviewed, and auditors did not issue any nonconformance reports (i.e., Potential Deviations from Quality (PDQs)) as a result of these audits. Therefore, based on:

- Significantly reduced operational demands on facility staff with all spent fuel stored at the ISFSI;

Performance and Qualifications of Nuclear Facility Technical Staff Audit (RSQM Section XVIII, Step 6.1b): (Continued)

- No nuclear safety concerns associated with 10 CFR 50 licensed activities;
- A majority of the dismantlement work complete;
- Spent fuel storage at the ISFSI being an essentially static activity with security the predominant function;
- The technical staff's extensive nuclear power plant work experience;
- The continuation of ISFSI and decommissioning staff training programs; and
- Auditors not identifying any significant problems that warranted a PDQ in the last five audits of this program area,

The District believes reducing the Performance and Qualifications of Nuclear Technical Staff audit frequency from once each year to once every two years is warranted and commensurate with the current Rancho Seco decommissioning status with all spent fuel stored at the ISFSI.

Corrective Action Program Audit (RSQM Section XVIII, Step 6.1c):

The District is reducing the Rancho Seco Corrective Action Program (CAP) audit frequency from once every six months to once every two years. The following discussion provides the basis for reducing the CAP audit frequency.

District completion of spent fuel transfer to the ISFSI significantly reduced operational demands, safety concerns, and regulatory requirements applicable to Rancho Seco compared to reactor or decommissioning operations with spent fuel stored in the spent fuel pool. Storing spent fuel at the ISFSI is an essentially static activity with security the predominant function. Plant personnel perform a few, periodic maintenance activities designed to monitor the condition of the fuel canisters and storage system. Reduced operational demands along with completion of a majority of the decommissioning work at Rancho Seco have resulted in a significantly reduced number of nonconformances (i.e., Potential Deviations from Quality) that require corrective action. The number of Potential Deviations from Quality (PDQs) written in accordance with the CAP reduced from 145 in 2001 (during spent fuel transfer to the ISFSI) to 74 in 2003 (when all spent fuel was stored at the ISFSI). Also, the number of PDQs plant management determined were a Deviation from Quality (DQ) and warranted a Cause, Extent, Remedial action, and Preventive action evaluation in accordance with the CAP reduced from 52 in 2001 to 26 in 2003.

In the Safety Evaluation Reports for Rancho Seco License Amendments 129 and 130, the NRC concluded there are no longer any nuclear safety issues associated with 10 CFR 50 licensed activities with all spent fuel stored at the ISFSI. Because the CAP audit is only required to evaluate nonconformances associated with nuclear safety issues, the District is only required to perform the CAP audit to ISFSI related nonconformances.

Corrective Action Program Audit (RSQM Section XVIII, Step 6.1c): (Continued)

Since the ISFSI first went into full operation in August 2002 (i.e., all spent fuel stored at the ISFSI), Rancho Seco personnel have written about 100 PDQs with only 10 of these PDQs associated with ISFSI operations. Of the 10 ISFSI related PDQs, plant management determined four of these PDQs were significant enough to be designated a DQ and warrant a Cause, Extent, Remedial action, and Preventive action evaluation. Most of the ISFSI related PDQs were administrative in nature and associated with initial implementation of the ISFSI security design. Overall, most of the PDQs written at Rancho Seco have been associated with decommissioning activities that have no nuclear safety significance. Because of the small number of ISFSI related nonconformances, reducing the CAP audit frequency from once per year to once every two years is warranted and provides assurance a larger sample size will be available for auditors to conduct a more meaningful audit.

The District reviewed the results of the semi-annual CAP audit for the last five years (10 audits) and concludes reducing the CAP audit frequency from once every six months to once every two years will not adversely impact Rancho Seco's ability to safely decommission the 10 CFR 50 licensed facility or store spent fuel at the ISFSI. The District did not identify any significant CAP problems during the five-year period reviewed, and auditors did not issue any PDQs as a result of these audits.

Rancho Seco continues to maintain a CAP in accordance with approved procedures. CAP implementation provides assurance nonconformances with any safety significance are properly identified and appropriate corrective actions taken in a timely manner, thereby ensuring continued safe decommissioning operations as well as ISFSI operations. Therefore, based on:

- Reduced operational demands, regulatory requirements, and safety concerns with all spent fuel is stored at the ISFSI;
- Spent fuel storage at the ISFSI being an essentially static activity with security the predominant function;
- The significantly reduced number of PDQs generated since completion of spent fuel transfer to the ISFSI;
- The very small number of ISFSI related PDQs and DQs generated since completion of spent fuel transfer to the ISFSI;
- Most of the ISFSI related PDQs being administrative in nature and associated with initial implementation of the ISFSI security design; and
- Auditors not identifying any significant problems that warranted a PDQ in the last 10 CAP audits,

Corrective Action Program Audit (RSQM Section XVIII, Step 6.1c): (Continued)

The District believes changing the CAP audit frequency from once every six months to once every two years is warranted and commensurate with the current Rancho Seco decommissioning status with all spent fuel stored at the ISFSI.

Fire Protection Program Audit (RSQM Section XVIII, Step 6.1h):

The Rancho Seco Fire Protection Program (FPP) audit currently has an annual and a biennial audit component. The annual Independent Fire Protection and Loss Prevention inspection and audit requires use of qualified off-site licensee personnel or outside fire protection consultants, with the requirement to use outside, qualified fire protection consultants at least every third year. The District is maintaining the biennial Fire Protection Requirements and Implementing Procedures Compliance audit and eliminating the annual Independent Fire Protection and Loss Prevention inspection and audit (previously RSQM Steps 6.1i and 6.1j). The following discussion provides the basis for this FPP audit change.

Rancho Seco Decommissioning Order (RSDO), approved by the NRC and issued March 20, 1995, established the FPP requirements applicable to Rancho Seco during decommissioning. Condition (B) to the RSDO requires the District to maintain a FPP that addresses the potential for fires that could result in a nuclear hazard (i.e., cause the release or loss of control of radioactive material). RSDO Condition (B) also requires the District to assess the FPP on a regular basis during decommissioning. The Fire Protection Requirements and Implementing Procedures Compliance audit currently performed every two years (the biennial FPP audit; RSQM Step 6.1h) satisfies this RSDO Condition (B) FPP assessment requirement.

In accordance with the RSQM, the QAP does not apply to any fire protection equipment during decommissioning. Also, the ISFSI design precludes the need for any fire protection equipment to safely store spent fuel at the ISFSI. District completion of spent fuel transfer to the ISFSI significantly reduced the nuclear hazards and safety concerns associated with fires at Rancho Seco compared to reactor operations or decommissioning the facility with spent fuel stored in the spent fuel pool. Storing spent fuel at the ISFSI is an essentially static activity with security the predominant function. Plant personnel perform a few, periodic maintenance activities designed to monitor the condition of the fuel canisters and storage system. In addition, the District has completed a majority of the dismantlement work (except large components), including removal of over 90% of the Reactor Building systems, about 90% of the Auxiliary Building equipment, all the secondary plant equipment from the Turbine Building, and most generated decommissioning waste.

The only ISFSI related FPP requirements are administrative limits regarding diesel fuel quantity and vehicle type allowed at the ISFSI site. This limit is specified in ISFSI Technical Specification 5.7. Only diesel or electric vehicles are permitted at the ISFSI site, and the amount of diesel fuel in any one vehicle is limited to 200 gallons. The ISFSI related administrative FPP requirements are assessed on a regular basis in the biennial Fire Protection Requirements and Implementing Procedures Compliance audit.

Fire Protection Program Audit (RSQM Section XVIII, Step 6.1h): (Continued)

The basis for the current annual and biennial FPP audit requirements is NRC Generic Letter 82-21 (GL 82-21), "Technical Specifications for Fire Protection Audits." The NRC developed GL 82-21 to provide guidance to nuclear power reactor licensees on acceptable FPP Technical Specification audit requirements. The NRC did not consider applying GL 82-21 to defueled nuclear power plant undergoing decommissioning when the NRC issued GL 82-21. In the Safety Evaluation Report for Rancho Seco License Amendment 129, the NRC concluded there are no longer any nuclear safety issues associated with 10 CFR 50 licensed activities at Rancho Seco with all spent fuel stored at the ISFSI. The potential for fires and the potential consequences associated with those fires are tremendously reduced during the current decommissioning phase compared to when the District operated the Rancho Seco reactor or stored spent fuel in the spent fuel pool. Applying the entire GL 82-21 fire protection program audit guidance to Rancho Seco during the current decommissioning and spent fuel storage condition is excessive, administratively burdensome, and not what the NRC originally intended when it issued GL 82-21.

The District will continue to use the guidance in GL 82-21 Enclosure I and Section 10 of Enclosure 2 to perform the biennial FPP audit. No change to the biennial FPP audit is requested. But, the District is eliminating the annual Independent Fire Protection and Loss Prevention inspection and audit. The District considers performing multiple FPP assessments in accordance with GL 82-21 at Rancho Seco is an unnecessary administrative burden considering Rancho Seco's current decommissioning status with all spent fuel stored at the ISFSI. Implementing the applicable GL 82-21 guidance referenced above for the biennial FPP audit is sufficient and meets the RSDO Condition (B) requirement to assess the FPP on a regular basis.

The Rancho Seco 10 CFR 50 accident analysis addresses operational accidents during decommissioning, including fires. The Rancho Seco accident analysis concludes that the accident analysis discussed in NUREG/CR-0130, "Technology, Safety, and Cost of Decommissioning a Reference PWR," bounds Rancho Seco during decommissioning. The potential consequences of postulated operational decommissioning accidents at Rancho Seco would be less than evaluated in NUREG/CR-0130 because the radionuclide inventory at Rancho Seco is significantly less than assumed in NUREG/CR-0130 due to on-going decontamination and dismantlement efforts, substantial radioactive waste shipments, and radioactive decay. Therefore, the potential consequences of operational decommissioning accidents at Rancho Seco are bounded by the NUREG/CR-0130 accident analysis.

The District reviewed the FPP audit results from the last five years and concludes eliminating the annual Independent Fire Protection and Loss Prevention inspection and audit component from the FPP audit will not adversely impact Rancho Seco's ability to safely decommission Rancho Seco or safely store spent fuel at the ISFSI. The District did not identify any significant FPP problems during the five-year period reviewed, and plant management determined the audit findings did not warrant issuance of any PDQs. Therefore, based on:

- No nuclear safety issues associated with 10 CFR 50 licensed activities;

Fire Protection Program Audit (RSQM Section XVIII, Step 6.1h): (Continued)

- The RSDO establishing the basis for the decommissioning FPP;
- The ISFSI design precluding the need for fire protection equipment at the ISFSI;
- No fire protection equipment falling under the QAP during decommissioning;
- Spent fuel storage at the ISFSI being an essentially static activity with security the predominant function;
- Continuing biennial FPP assessments that include ISFSI fire protection administrative requirements and use of specific GL 82-21 guidance;
- The District continuing to make significant progress in removing plant systems and equipment and processing and shipping generated radioactive decommissioning waste;
- The NUREG/CR-0130 decommissioning accident analysis evaluating fires and the NUREG/CR-0130 evaluation bounding Rancho Seco decommissioning activities; and
- Auditors not identifying any significant problems that management determined warranted a PDQ in the last five FPP audits,

The District considers strict adherence to NRC GL 82-21 for FPP audit implementation is excessive and that modification to the FPP audit requirement is warranted. The existing biennial FPP compliance audit, which uses specific guidance in GL 82-21, meets the RSDO requirement for FPP assessment on a regular basis and is sufficient to verify adequate FPP implementation in accordance with RSDO Condition (B). The District believes eliminating the annual Independent Fire Protection and Loss Prevention inspection and audit is acceptable and commensurate with the current Rancho Seco decommissioning status with all spent fuel stored at the ISFSI.

Radiological Environmental Monitoring Program (REMP) Audit (RSQM Section XVIII, Step 6.1i):

The District is reducing the REMP audit frequency from once per year to once every two years. The following discussion provides the basis for reducing the REMP audit frequency.

The off-site exposure estimates independently calculated through the REMP and the Off-site Dose Calculation Manual (ODCM) programs have been consistent with each other and well within the 10 CFR 50, Appendix I dose objectives since well before permanent plant shutdown in 1989. The REMP and ODCM program implementation results show radioactive effluent during permanent plant shutdown, decommissioning, and ISFSI operations have had minimal impact on the surrounding environment and public health and safety.

Radiological Environmental Monitoring Program (REMP) Audit (RSQM Section XVIII, Step 6.1i): (Continued)

Radioactive liquid effluent is released from Rancho Seco on a batch basis. These releases have become less frequent as decommissioning has progressed. The last radioactive liquid effluent batch release occurred in September 2003. The District expects periodic, low-level radioactive liquid releases to continue during the next few years of decommissioning activities. Gaseous effluent particulate samples from areas being decommissioned are routinely analyzed and occasionally contain very low levels of radioactive particulate matter near the detection limits. In addition, the District has completed a majority of the dismantlement work (except large components), including removal of over 90% of the Reactor Building systems, about 90% of the Auxiliary Building equipment, all the secondary plant equipment from the Turbine Building, and most generated decommissioning waste. Very little potential remains to produce more than small quantities of radioactive effluent during the final phases of decommissioning at Rancho Seco.

The District reviewed the annual REMP audit results for the last five years and concludes that reducing the REMP audit frequency from once per year to once every two years will not adversely impact Rancho Seco's ability to safely decommission the facility or store spent fuel at the ISFSI. The District did not identify any significant problems during the five-year period reviewed, and auditors did not issue any PDQs as a result of these REMP audits.

The REMP and ODCM programs are companion radiological effluent monitoring and evaluation programs. The ODCM Program and Implementing Procedures audit is required once every two years. Reducing the REMP audit frequency from once per year to once every two years is consistent with the ODCM Program and Implementing Procedures audit. Therefore, based on:

- REMP and ODCM off-site exposure estimates being consistent with each other, well within the 10 CFR 50, Appendix I dose objectives, and indicating plant shutdown, decommissioning, and ISFSI operations have had minimal impact on the surrounding environment and public health and safety;
- A majority of the dismantlement work complete;
- ODCM program audit currently performed once every two years;
- The District expecting to produce no more than small quantities of low level radioactive effluent during the final phases of decommissioning; and
- Auditors not identifying any significant problems that warranted a PDQ during the last five REMP audits,

The District believes reducing the REMP audit frequency from once per year to once every two years is warranted and commensurate with the current Rancho Seco decommissioning status with spent fuel stored at the ISFSI.

BASIS FOR CHANGES TO RANCHO SECO QUALITY ASSURANCE PROGRAM

Quality Assurance Program for Effluent Control and Environmental Monitoring Audit (RSQM Section XVIII, Step 6.1l):

The District is reducing the Quality Assurance Program (QAP) for Effluent Control and Environmental Monitoring audit from once per year to once every two years. The following discussion provides the basis for reducing the QAP for Effluent Control and Environmental Monitoring audit frequency.

As specified in the Rancho Seco Quality Manual (RSQM), the District applies NRC Regulatory Guide 4.15 (RG 4.15), "Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment," to the Rancho Seco Effluent Control and Environmental Monitoring programs. RG 4.15 meets the 10 CFR 50, Appendix B QAP criteria applicable to the Rancho Seco Effluent Control and Environmental Monitoring programs. The hardware that falls under the Rancho Seco RG 4.15 QAP is limited to the radioactive sources used to measure equipment that (1) measures the quantity of radioactive material in liquid and gaseous effluent and (2) shows compliance with the regulatory release limits and guidelines.

Though the RG 4.15 QAP continues to apply to the Rancho Seco Effluent Control and Environmental Monitoring programs, the scope, activity, and safety significance of these programs apply to have significantly reduced. The District has completed a majority of the dismantlement work (except large components), including removal of over 90% of the Reactor Building systems, about 90% of the Auxiliary Building equipment, all the secondary plant equipment from the Turbine Building, and most generated decommissioning waste. Also, the ISFSI is designed such that no radioactive effluent is produced during normal operations. Very little potential remains to produce more than small quantities of radioactive effluent during the final phases of decommissioning at Rancho Seco.

The District performs batch releases of liquid effluent from Rancho Seco. Radioactive liquid effluent releases have become less frequent as decommissioning has progressed. The last radioactive liquid effluent batch release occurred in September 2003. The District expects periodic, low-level radioactive liquid releases to continue during the next few years of decommissioning activities.

Gaseous effluent samples from radioactively contaminated areas being decommissioned are analyzed on a monthly basis and occasionally contain very low levels of radioactive particulate matter near the detection limits. The potential exists for the presence of only very small quantities of radioactive particulate matter in gaseous effluent during the final phases of decommissioning.

Exposure estimate results from the Effluent Control and Environmental Monitoring programs (ODCM and REMP programs) have been consistent and well within the 10 CFR 50, Appendix I dose objectives since before permanent plant shutdown in 1989. The REMP and ODCM program results indicate plant shutdown, decommissioning, and ISFSI operations have had minimal impact on the surrounding environment and public health and safety.

Quality Assurance Program for Effluent Control and Environmental Monitoring Audit (RSQM Section XVIII, Step 6.1n): (Continued)

The District reviewed the annual QAP for Effluent Control and Environmental Monitoring audit results for the last five years and concludes that reducing this audit frequency from once per year to once every two years will not adversely impact Rancho Seco's ability to safely decommission the facility or store spent fuel at the ISFSI. The District did not identify any significant problems during the five-year period reviewed, and auditors did not issue any PDQs as a result of these audits. Therefore, based on:

- RG 4.15 QAP meeting the 10 CFR 50, Appendix B QAP criteria applicable to the Rancho Seco Effluent Control and Environmental Monitoring programs;
- A majority of the dismantlement work complete;
- The District expecting to produce no more than small quantities of low-level radioactive effluent during the final phases of decommissioning;
- REMP and ODCM program results indicating plant shutdown, decommissioning, and ISFSI operations have had minimal impact on the surrounding environment and public health and safety; and
- Auditors not identifying any significant problems that warranted a PDQ during the last five QAP for Effluent Control and Environmental Monitoring audits,

The District believes reducing the audit frequency for the QAP for Effluent Control and Environmental Monitoring audit from once per year to once every two years is warranted and commensurate with the current Rancho Seco decommissioning status with spent fuel stored at the ISFSI.

CONCLUSION

Finally, the QAP audit program changes, described and justified above, are administrative in nature and do not eliminate auditing in any QAP program area. 10 CFR 50, Appendix B criterion XVIII, "Audits" provides a general description of an audit program and does not specify audit frequencies or the program areas to be audited. Since the District will continue to perform audits in all currently audited QAP program areas and the NRC previously accepted the QAP as satisfying the 10 CFR 50, Appendix B criteria, the proposed QAP audit program changes will continue to satisfy the 10 CFR 50, Appendix B criteria, specifically criterion XVIII.

ATTACHMENT 2

REVISION SUMMARY:

1. Changed the Performance and Qualifications audit frequency from once per year to once every two years.

2. Changed to Corrective Action Program audit frequency from once every 6 months to once every two years.

3. Eliminated the independent fire protection and loss prevention inspection and audit.

4. Changed the REMP audit frequency from once per year to once every two years.

5. Changed the Quality Assurance Program for Effluent Control and Environmental Monitoring (Reg. Guide 4.15) audit frequency from once per year to once every two years.

XVIII. AUDITS

1.0 PURPOSE

Describe the Rancho Seco Quality Assurance Program (QAP) measures that (1) establish a comprehensive system of planned and periodic audits, and (2) determine the effectiveness of the QAP at the Rancho Seco nuclear facility, which includes the Rancho Seco Nuclear Generating Station (RSNGS; licensed and undergoing decommissioning pursuant to 10 CFR 50) and the Independent Spent Fuel Storage Installation (ISFSI; licensed and operated pursuant to 10 CFR 72).

2.0 REFERENCE DOCUMENTS

2.1 10 CFR 50, Appendix B, Criterion XVIII, Audits

2.2 Safety Guide 33/ANSI N18.7, Administrative Controls for Nuclear Power Plants

2.3 Reg. Guide 1.144/ANSI N45.2.12-1977, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants

2.4 Reg. Guide 1.146/ANSI N45.2.23-1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants

2.5 10 CFR 50.54(a), Conditions of Licenses

2.6 10 CFR 71.137, Audits

2.7 10 CFR 72.176, Audits

3.0 POLICY

Procedures shall be established and implemented to assure that planned and periodic audits are conducted to verify compliance with all aspects of the QAP.

4.0 GENERAL REQUIREMENTS

6.3 Quality Assurance shall establish a schedule for auditing the activities affecting quality. The audit schedule shall be consistent with the audit requirements and frequencies specified herein.

6.4 The audit program shall be described in procedures that implement this RSQM section.

6.5 Audits shall be conducted to determine the adequacy and effectiveness of programs implemented for the design, procurement, modification, maintenance, and operational activities at the Rancho Seco nuclear facility.

6.6 Audit plans shall be developed that identify the audit scope, the requirements, activities to be audited, organizations to be notified, the applicable documents, and the audit schedule.

6.7 Audits shall be performed using approved audit checklists.

6.8 Audit reports shall be issued which identify the activity that was audited, the personnel that were contacted during the audit, and any conditions adverse to quality noted during the audit.

6.9 Process conditions identified as adverse to quality using the Rancho Seco Corrective Action Program.

6.10 Personnel conducting audits shall be trained and qualified in accordance with Reference 2.4.

6.11 Regularly scheduled audits shall be supplemented by special audits/surveillances when conditions that warrant special audits exist or when requested by SMUD management personnel.

5.0 RESPONSIBILITIES

General organizational responsibilities are described in Section I, ORGANIZATION.

5.1 Quality Assurance is responsible for:

a. Establishing a schedule for performance of required audits.

b. Reviewing audit results to evaluate the effectiveness of the QAP.

c. Implementation of the established audit program.

d. Training and qualification of audit personnel.

e. Preparation of trend analysis data.

5.2 Each department is responsible for:

a. Supporting the audit activities.

b. Providing prompt response to any deviations from quality identified in the audit.

6.0 AUDITS AND AUDIT FREQUENCIES

6.1 Audits of Rancho Seco nuclear facility activities shall be performed under the cognizance of the Quality Assurance organization supervisor. The required audits and audit performance frequencies are as follows:

a. Conformance to the Rancho Seco nuclear facility Technical Specifications and associated license conditions at least once per year;

b. Performance and qualifications of the Rancho Seco nuclear facility technical staff at least once every two years; 10→←

c. Actions taken to correct deficiencies occurring in facility structures, systems, components, or methods of operation associated with the safe operation of the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) at least once every two years for those deficiencies not previously audited (Corrective Action Program audit); 10→←

d. Performance of activities required by the QAP to meet the 10 CFR 50, Appendix B criteria at least once every two years;

e. Rancho Seco nuclear facility Emergency Plan and implementing procedures at least once per year;

f. 10 CFR 72 ISFSI Physical Protection Plan and implementing procedures at least once per year;

g. Other areas of Rancho Seco nuclear facility operation considered appropriate by the Plant Manager;

h. Compliance with fire protection requirements and implementing procedures at least once every two years;

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i. Radiological Environmental Monitoring Program (REMP) and the results thereof at least once every two years;

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j. Off-site Dose Calculation Manual (ODCM) and implementing procedures at least once every two years;

k. Process Control Program (PCP) and implementing procedures for processing and packaging of radioactive wastes from liquid systems at least once every two years;

l. Performance of activities required by the Quality Assurance Program for Effluent
10→ Control and Environmental Monitoring (Reg. Guide 4.15) at least once every two
← years; and

m. Radiation Protection Program content and implementation once per year.

6.2 Changes to these audits and audit frequencies are subject to the requirements contained in 10 CFR 50.54(a). In addition, frequencies specified in 10 CFR and related to the performance of specific audits may not be changed unless an exemption or waiver is obtained from the NRC.

6.3 The audit reports resulting from items a. through o. above shall be forwarded to the Plant Manager, the AGM, Energy Supply, and the management positions responsible for the areas reviewed within 30 days after completion.